

U.S. Department
of Transportation

United States
Coast Guard



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16711
15 April 1999

From: Commander, Eighth Coast Guard District
To: Distribution

Subj: LIFTBOAT DRYDOCK ALTERNATIVES

1. Enclosure (1) is forwarded for your information and use.
2. Direct questions to LCDR W. H. Daughdrill of my staff at (504) 589-6193.


M. J. BROWN
By direction

Encl: (1) COMDT (G-MOC-3) ltr 16711 to IADC of 30 March 1999

Dist: All Eighth District Gulf Region MSOs, MSU and MSDs

U.S. Department
of Transportation

United States
Coast Guard



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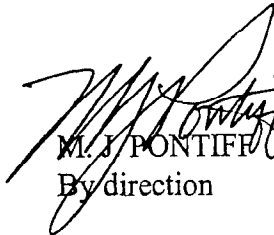
16711

MAR 30 1999

From: Commandant (G-MOC)
To: Distribution

Subj: LIFTBOAT DRYDOCK ALTERNATIVES

1. The enclosed letter addressed the Coast Guard's position on alternative methods for drydocking liftboats. All OCMI's shall familiarize themselves with the provisions found in 46 CFR 125.170 and § 107.267, and they should remain open to proposed alternative methods of drydocking liftboats which provide a similar level of safety as a standard vessel drydocking.
2. Should you have any further questions regarding this matter, please feel free to contact LT James Robertson of my staff at 202-267-0496.


M. J. PONTIFF
By direction

Encl: (1) G-M ltr to Offshore Marine Service Association dtd 4FEB99

Distribution: CCGD8(m)
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U.S. Department
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United States
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16710

FEB 4 1999

Mr. Robert J. Alario
President
Offshore Marine Service Association
990 N. Corporate Drive, Suite 210
Harahan, LA 70123

Dear Mr. Alario:

This is in response to your letter of December 21, 1998. Your letter and the attached correspondence proposes that the drydocking requirements found in 46 Code of Federal Regulations (CFR) Subchapter L, for all offshore supply vessels, be modified to allow for alternate means of conducting liftboat drydock examinations. Under the existing provisions found in 46 CFR 125.170, an Officer in Charge, Marine Inspection (OCMI) may accept alternatives to the requirements of Subchapter L, provided an equivalent level of safety can be demonstrated. I agree with the information submitted, that in most instances the entire hull of a liftboat can be adequately examined by jacking it out of the water. However, a critical area that poses more problems is the ability to adequately examine all portions of the pads. Liftboat owners or operators may request an alternative to drydocking, on a case-by-case basis, by contacting the OCMI. Such requests should include the information required for self-elevating Mobile Offshore Drilling Unit found in 46 CFR 107.267.

These options will be reviewed and addressed more specifically in the upcoming supplemental rulemaking for Subchapter L. If you have any further questions regarding this matter, please contact Commander Mark Prescott at the above number.

Sincerely,

A handwritten signature in black ink, appearing to read "B. C. North", written over a horizontal line.

B. C. NORTH
Rear Admiral, U.S. Coast Guard
Assistant Commandant for Marine
Safety and Environmental Protection